

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
(Eastern Division)

In re

ANDREW GREENHUT,

Debtor.

Chapter 13
Case No. 19-10782-FJB

ASSENTED-TO MOTION TO AMEND DISCOVERY SCHEDULE

Gita Srivastava (“Srivastava”), the holder of divorce-related claims against Andrew Greenhut (the “Debtor”), hereby requests that this Honorable Court enter an Order amending the discovery schedule in this matter. The Debtor has assented to the relief requested herein. In support of this Motion, Srivastava represents as follows:

1. By Order of this Court dated January 3, 2020 [Doc. No. 148] (the “Pretrial Order”), the Court established a discovery schedule in this matter. The discovery deadline established therein was February 28, 2020. Prior to the expiration of such deadline, Srivastava’s counsel and counsel to the Debtor agreed to an extension of the deadline to accommodate ongoing discovery, including the continued deposition of the Debtor.

2. Discovery issues have arisen between the parties, which they are working amicably to resolve.

3. In light of the current crisis occasioned by COVID-19, the continued deposition of the Debtor presents practical challenges. The parties require additional time to address those challenges so as to proceed with the deposition in a safe and efficient manner.

4. Furthermore, given the evidentiary nature of this dispute and the necessity of a trial, an extension increases the likelihood that in-person hearings might again be conducted in the Court.

5. Accordingly, Srivastava requests that the discovery schedule be amended as follows:

- a. All fact discovery shall be completed by May 31, 2020;
- b. A joint pretrial memorandum shall be filed by June 30, 2020;
- c. The further pretrial hearing shall be continued to a date after July 31, 2020; and
- d. The evidentiary hearing shall be continued to a date after August 31, 2020;

6. Counsel to the Debtor has reviewed this Motion and assents to the relief requested herein.

WHEREFORE, Srivastava requests that the Court enter an Order: (i) allowing this Motion; (ii) approving the discovery schedule proposed herein; and (iii) granting such other and further relief as just and necessary.

Respectfully submitted,

GITA SRIVASTAVA,

By her attorneys,

/s/ Alex F. Mattera

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Dated: March 31, 2020

CERTIFICATE OF SERVICE

I, Alex F. Mattera, hereby certify that on the 31st day of March 2020 I caused to be served a copy of the above pleading on all parties registered for electronic service through the CM/ECF system.

/s/ Alex F. Mattera

Alex F. Mattera